

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Claude M. Stern (Bar No. 96737)

2 claudestern@quinnemanuel.com

Evette Pennypacker (Bar No. 203515)

3 evettepennypacker@quinnemanuel.com

Thomas R. Watson (Bar No. 227264)

4 tomwatson@quinnemanuel.com

555 Twin Dolphin Dr., 5th floor

5 Redwood Shores, CA 94065

Telephone: (650) 801-5000

6 Facsimile: (650) 801-5100

7 Joshua L. Sohn (Bar No. 250105)

50 California Street, 22nd Floor

8 San Francisco, CA 94111

Telephone: (415) 875-6600

9 Facsimile: (415) 875-6700

10 Attorneys for Defendant Fusion Garage PTE Ltd.

11 WINSTON & STRAWN LLP

Andrew P. Bridges (Bar No.: 122761)

12 abridges@winston.com

David S. Bloch (SBN: 184530)

13 dbloch@winston.com

Matthew A. Scherb (Bar No. 237461)

14 mscherb@winston.com

WINSTON & STRAWN LLP

15 101 California Street, 39th Floor

San Francisco, CA 94111-5802

16 Telephone: (415) 591-1000

Facsimile: (415) 591-1400

17 Attorneys for Plaintiffs TechCrunch, Inc., et al.

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 TECHCRUNCH, INC. a Delaware
corporation, and CRUNCHPAD, INC., a
Delaware corporation,

22 Plaintiffs,

23 vs.

24 FUSION GARAGE PTE. LTD, a Singapore
25 company,

26 Defendant.

CASE NO. 09-cv-5812 RS (PSG)

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

Pursuant to Local Rule 6-2 and 16-2(e), Plaintiffs TechCrunch, Inc. and CrunchPad, Inc. (collectively, "Plaintiffs"), and Defendant Fusion Garage PTE, Ltd. ("Defendant"), by and through their respective counsel of record, hereby stipulate to continue the Initial Case Management Conference scheduled for March 17, 2011.

1. Reason for the Request

The Court denied Defendant's Motion to Dismiss the Amended Complaint on February 9, 2011 and, at the same time, set an Initial Case Management Conference for March 17, 2011. *See* Dkt. 194. However, lead counsel for Defendant Fusion Garage is currently scheduled to argue motions for summary judgment on March 17, 2011 in the case captioned *Bedrock Computer Technologies, LLC v. Softlayer Technologies, Inc. et al.*, 6:09-cv-00269-LED-JDL (E.D. Tex.).

As a result, the parties have agreed to request a continuation of the Initial Case Management Conference in this matter until March 31, 2011.

The parties will file a Case Management Conference statement and its ADR certifications by March 24, 2011.

2. Prior Time Modifications

The following time modifications have been previously made in this case: time to file a responsive pleading (Dkt. No. 16); motion to set the hearing dates on Fusion Garage's motion to dismiss, to strike, and for a more definite statement ("motion to dismiss") and Plaintiffs' motion for a preliminary injunction to May, 6, 2010 (Dkt. No. 45); motion to shorten time to hear Fusion Garage's motion to compel documents to support its opposition to Plaintiffs' Motion for a preliminary injunction (Dkt. No. 55); setting new hearing date on Plaintiffs' motion for a preliminary injunction and defendant's motion to dismiss (Dkt. 64); granting extension of time regarding briefing on Plaintiffs' motion to compel (Dkt. 178); and granting a brief extension of time to comply with an order compelling the production of redacted source code (Dkt. 188).

3. Effect of Requested Modification

The requested modification will have no effect on the rest of the schedule in this action.

So Stipulated.

1 NOW, THEREFORE, the parties to this action, through their respective counsel of record,
2 AGREE AND HEREBY STIPULATE, if agreeable to the Court, to continue the Initial Case
3 Management Conference until March 31, 2011 at 10:00 a.m. The parties will submit a Case
4 Management Conference Statement and their ADR certifications by March 24, 2010.

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6 IT IS SO STIPULATED.

7 Dated: March 9, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

8
9 By /s/ Thomas R. Watson

10 Thomas R. Watson

11 Attorneys for Defendant Fusion Garage PTE., Ltd.

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13 DATED: March 9, 2011

WINSTON & STRAWN LLP

14
15 By /s/ Matthew A. Scherb

16 Matthew A. Scherb

17 Attorneys for Plaintiffs TechCrunch, Inc. and
18 CrunchPad, Inc.

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20 Pursuant to stipulation, it is SO ORDERED.

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22 DATED: March 10, 2011

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25 HON. RICHARD SEEBORG
26 UNITED STATES DISTRICT COURT JUDGE
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